



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

February 11, 2022

**BY ECF**

The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Ethan Phelan Melzer*, S1 20 Cr. 314 (GHW)**

Dear Judge Woods:

The parties write jointly to request an adjournment of the trial in this case, which, as the Court is aware, is now scheduled to begin April 25, 2022. The parties respectfully make this request principally in light of anticipated conflicts for certain of the parties' trial counsel with the presently anticipated trial date in this case. Following consultation with Your Honor's chambers earlier today, the parties understand that the Court's calendar may accommodate a trial in this matter within the period from May 23, 2022 through June 11, 2022, and the parties are available in that window, should the Court grant the relief requested herein. This relatively brief adjournment—approximately one month from the currently-set trial date—would help ensure continuity of the counsel in this case, allow the defendant additional time to review discovery, and allow both parties additional time to prepare to try this case. For these reasons, the Government submits that an exclusion of time under the Speedy Trial Act would be appropriate if an adjournment is ordered. The defendant, through counsel, has consented to the exclusion of time. Per the Court's individual rules, the Government is submitting a proposed Order as to the exclusion of time under the Speedy Trial Act in Adobe PDF format on ECF, attached as Exhibit A, and in Microsoft Word format by email.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

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cc: Defense Counsel (by Email and ECF)